



**Executive Member for Regeneration
4 October 2016**

**Decision to be taken
on or after 12 October 2016**

Ward: All

Key Decision: No

Proposed Modifications to the Adur Local Plan

Report by the Director for Economy

1.0 Summary

1.1 Following publication of Amendments to the Proposed Submission Adur Local Plan (2016) the Adur Local Plan will shortly be submitted to the Planning Inspectorate. The Executive Member for Regeneration is asked to agree Proposed Major and Minor Modifications, to be submitted alongside the Adur Local Plan, as well as a Sustainability Appraisal addendum which considers the effects of the Proposed Major Modifications on the Sustainability Appraisal of the Adur Local Plan.

2.0 Background

2.1 The Executive Member will recall that in March 2016 Full Council resolved that the Adur Local Plan should be submitted to the Planning Inspectorate for Examination, following publication of the Amendments to the Proposed Submission Adur Local Plan (2016) under Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.2.1 Publication took place from 31st March – 11th May 2016 and representations were received from 31 individuals and organisations. (These are available on the Council's website). In addition, Council delegated authority to the Head of Economic Growth to further amend the Amendments to the Proposed Submission Adur Local Plan (2016) prior to publication, and also the Sustainability Appraisal and Sequential and Exceptions Test, where amendment is required to correct minor errors and for purposes of clarification only.

3.0 Proposal

3.1 Following consideration of the representations received, it is suggested that some modifications to the Plan are proposed for consideration by the Inspector alongside the Adur Local Plan when it is submitted to the Planning Inspectorate. These are limited in number, and are considered necessary and useful to ensure the Plan is sound and up-to-date. If they are agreed by the Inspector they will be subject to public consultation after the examination hearings and before the Plan is adopted. These are referred to as Major

Modifications, and are attached as Appendix 2 to this report. They include the following matters:

- Amendment to the Vision to make reference to natural capital.
 - Amendments to references to the Objectively Assessed Housing Need figure for Adur. Further work has been undertaken, based on the recently-published 2014 sub-national population and household projections, and is now available on the Council's website (Objectively Assessed Housing Need Update 2016). Using this information, the OAN for Adur increases to 325 dwellings per annum. As a result, references to this figure, and the resulting 'shortfall' when proposed delivery is measured against this, are proposed to be updated, in order to give the Inspector and others the most up-to-date information available. In addition the preferred 'housing mix' has also been updated on the basis of this evidence.
 - Clarifications to Policy 6: West Sompting regarding contributions to infrastructure.
 - Amendments to extend the Plan period to 2032, to ensure the Plan has a 15 year life post adoption (which is anticipated in 2017).
 - Amendments to several policies (Policy 28: Retail, Town Centres and Local Parades; Policy 9: Lancing; Policy 11: Shoreham-by-Sea; Policy 12: Southwick and Fishersgate, and relevant supporting text) are proposed, to allow appropriate D1 uses (defined as those D1 class uses contributing positively to vitality and viability, generating footfall throughout the day and retaining a shopfront) in secondary, and in some cases primary, retail frontages in certain circumstances, where certain tests have been met. This more flexible approach reflects recent planning consents and the need to take account of changing patterns of shopping which have emerged in recent years.
- 3.2 In addition, some Minor Modifications are proposed. These are not considered to affect the Plan, its policies or strategy, but address typographic errors, clarifications, updates to figures and references, some of which are necessary due to alterations made elsewhere, etc. Minor modifications do not require consideration by the Inspector at examination. However, by submitting these alongside the Plan and Major Modifications, the Inspector can be satisfied that they are truly 'minor' in nature. These may be found at Appendix 3 of this report.
- 3.3 In addition, an addendum to the Sustainability Appraisal has been prepared. This assesses the potential impact of the Proposed Major Modifications referred to above. The Sustainability Appraisal Addendum may be found at Appendix 4 of this report.
- 3.4 It should be noted that submission of the Adur Local Plan has been delayed slightly later than the anticipated date of late September, as had been anticipated in the report to Full Council in March 2016. This is due to delays in obtaining some relevant information.

3.5 For information, the Local Plan submitted to the Inspectorate will be entitled the 'Submission Adur Local Plan 2016.' This is the 'Amendments to the Proposed Submission Adur Local Plan (2016)', and contains no new changes or updates (other than those to explain the recent stages in the development of the Adur Local Plan). However, whereas the 'Amendments' version showed previous additions in bold text, and deletions as 'struck through', these textual enhancements have been removed and plain text used instead. It does not include the Proposed Major or Minor Modifications referred to above. This has been prepared on the advice of consultants, in order to make the document easier to read for the Inspector and other interested parties.

4.0 Legal

4.1 Submission of the Adur Local Plan will be carried out under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Plan has been prepared in accordance with the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012, the Localism Act 2011, and the National Planning Policy Framework (NPPF) 2012.

4.2 The accompanying Sustainability Appraisal of the Adur Local Plan has been undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

5.0 Financial implications

5.1 The production of the Adur Local Plan and associated publication is to be funded by the existing Planning Policy budget.

6.0 Recommendation

6.1 It is recommended that the Executive Member:

- i) agrees the Proposed Major Modifications and Proposed Minor Modifications to the Adur Local Plan, for submission.
- ii) agrees the Proposed Major Modifications Sustainability Appraisal Addendum, to be submitted alongside the Adur Local Plan.

Local Government Act 1972

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Schedule of other matters

Appendix 1

1.0 Council Priority

- 1.1 The Adur Local Plan will help to
- Support major regeneration projects to tackle deprivation;
 - Support businesses in creating jobs and regenerating neighbourhoods;
 - Seek to meet the housing needs of our communities;
 - Seek to safeguard Adur's environmental assets.

2.0 Specific Action Plans

- 2.1 Through specific policies within the emerging Local Plan, the Plan will contribute towards the provision of housing, employment and open space in Adur.

3.0 Sustainability Issues

- 3.1 The Government requires that the all Development Plan Documents be subject to a formal Sustainability Appraisal; this will be submitted alongside the Submission Adur Local Plan.

4.0 Equality Issues

- 4.1 The Local Plan aims to ensure that all groups in Adur have equal access to the opportunities offered by the new development plan. An Equalities and Health Impact Assessment report will be submitted alongside the Submission Adur Local Plan 2016, and an update, which will assess the Proposed Major Modifications, will also be provided.

5.0 Community Safety issues (Section 17)

- 5.1 No negative issues have been identified.

6.0 Human Rights Issues

- 6.1 No negative issues have been identified.

7.0 Reputation

- 7.1 The Local Plan must be prepared in line with Government policy and legislation and has been subject to extensive community involvement. The delivery of the policies and strategy will set a clear framework for development and the delivery of infrastructure, and seeks to meet Adur's needs, and therefore should have a positive impact on the reputation of the Council.

8.0 Consultations

- 8.1 A range of consultations have been carried out as part of the statutory plan-making process, in accordance with the Town and Country (Local Planning) (England) Regulations 2012.

9.0 Risk assessment

- 9.1 There is a statutory duty on the Council to prepare a Local Plan. Failure to produce the Local Plan could impact on a number of this Council's priorities including economic regeneration as well as the delivery of affordable housing.

10.0 Health & Safety Issues

- 10.1 Matters considered and no issues identified.

11.0 Procurement Strategy

- 11.1 This report complies with the Procurement Strategy.

12.0 Partnership working

- 12.1 Other agencies, including infrastructure providers will be involved in delivering the policies of the Adur Local Plan. They, and other stakeholders, organisations, local authorities, and individuals have been involved throughout the plan-making process.

Appendix 2: MAJOR MODIFICATIONS PROPOSED TO THE SUBMISSION ADUR LOCAL PLAN 2016

The schedule below sets out changes proposed to the Submission Adur Local Plan 2016, which has been submitted under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These are intended to assist the Inspector in understanding the Council's position.

Major modifications are proposed changes which alter the meaning of a policy or strategy. These changes are recommended to the Inspector, and if agreed by the Inspector will be subject to consultation after the examination hearings and before the adoption of the Local Plan.

In all cases the reason for the change is stated.

Mod No.	Reference (Paragraph, policy or map number)	Amendment (deleted text shown as struck through and additional text <u>shown in bold and underlined</u>)	Reasons For Change (Please note that references to representations refer to those received in response to the Amendments to the Proposed Submission Adur Local Plan 2016 unless otherwise stated).
MM1	Paragraph 1.34 Vision 7	Adur's character and local distinctiveness (urban and rural, coastal and countryside) will have been maintained and enhanced through protection and enhancement of its landscape, townscape, cultural heritage and biodiversity. Important views will have been protected. <u>Net gains in natural capital will have been delivered. ...</u>	To address issues raised by Sussex Wildlife Trust (Rep 70/25) and to clarify the need for the Plan to deliver net gains in natural capital.
MM2	Policy 2	Up to 2034 2 ...	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM3	Heading	HOUSING PROVISION 2011- 20342	To ensure Plan has 15 year time-span post anticipated adoption in 2017.

MM4	2.13	The most up-to-date work on OAN, and that which is used in this Local Plan, is the Objectively Assessed Need for Housing: Adur District 2015 study Objectively Assessed Housing Need Update 2016 ³	Update
MM5	Footnote	3 Objectively Assessed Need for Housing: Adur District 2015. Objectively Assessed Housing Need Update 2016 ³ (GL Hearn).	Update
MM6	2.14	This 2015- 2016 study uses an updated set of demographic projections, taking account of information including 2012 2014 -based Sub-National Population Projections (March 2014 May 2016) and the 2012 24 based Household Projections (February 2015 July 2016). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments.	To reflect updated evidence
MM7	2.16	In terms of Adur's Objectively Assessed Needs the study recommends the delivery of 294 325 dwellings per annum (6,825 5820 dwellings over the Plan period). This represents 'demand' for new housing.	To reflect updated evidence
MM8	2.16A	The OAN 2016 assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for 29 38 bedspaces over the plan period 2011-2034 2 which equates to 1-2 per annum.	To reflect updated evidence
MM9	2.20	This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4,296 3294 dwellings. It has therefore been necessary to allocate greenfield sites.	To reflect updated evidence
MM10	2.22	... Taking these greenfield sites into account the Plan can deliver 3609 dwellings (172 480 dpa), leaving a shortfall of 2214 3,216 dwellings.	To reflect updated evidence
MM11	Table 1	Table 1 – Housing supply over the Local Plan Period 2011-2034-2	To ensure Plan has 15 year time-span post anticipated adoption in 2017.

		<p>Sources of Housing Supply</p> <p>Dwellings completed (net) 2011-- 2015 528</p> <p>Existing commitments (large and small sites where planning permission has been granted) 326</p> <p>Sites identified in the SHLAA (net) 2015 291</p> <p>Windfall allowance 416</p> <p>Sites to be identified in Local Plan:</p> <p>Shoreham Harbour Broad Location 968</p> <p>New Monks Farm Strategic Allocation 600</p> <p>West Sompting Strategic Allocation 480</p> <p>Total Housing Supply (Delivery Target) 2011-2034₂ 3609</p> <p>(annual target 180-172)</p>	
MM12	2.23	Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of 5820 6825 dwellings	To reflect updated evidence.
MM13	Policy 3	<p>Policy 3: Housing Provision</p> <p>Over the period 2011 – 2034₂ a minimum of 3609 dwellings will be developed in Adur, as follows:</p> <ul style="list-style-type: none"> • 1429 within the built up area of Adur • 1100 as part of the Shoreham Harbour Regeneration Area Western Arm • 600 at New Monks Farm • 480 at West Sompting 	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM14	2.24	The figures in Policy 3 above equate to an annual target of 180-172 dwellings per year over the 20 ₁ year plan period.	To ensure Plan has 15 year time-span post anticipated adoption in 2017.

MM15	Policy 4	To facilitate regeneration and ensure a sustainable economy, land will be allocated to provide a total of approximately 41,000 square metres of land will be allocated of floorspace for appropriate employment generating uses in Adur...	To correct a drafting error.
MM16	Policy 4	up to 2034 2 at the following locations:	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM17	Policy 5	The Withy Patch Gypsy and Travellers site should be relocated, to allow for the delivery of the new roundabout access onto the A27 , and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.	To address a point made by Albermarle (Rep 65/48) in their response to the 2016 Local Plan consultation, to make clear that the travellers site would be relocated specifically to allow delivery of the proposed new roundabout access.
MM18	Policy 6 Second bullet point	<ul style="list-style-type: none"> ...A27 Sompting Bypass/ Upper Brighton Road (Lyons Farm junction), A27/Dankton Lane junction, and enhancement of the traffic calming scheme in West Street. 	Amendment made in response to comments made by Turleys (Rep 62/26) and Highways England (Rep 69/42)
MM19	Policy 6	<p>.....Appropriate mitigation of any issues raised through these assessments is to be secured.</p> <p>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate</p> <p>....and upsizing purposes.</p> <p>All elements are to be secured through s106/planning conditions. The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</p>	Correction of drafting error. There were two references to the collection of contributions in the policy. This has been simplified to one reference at the very end of the policy.
MM20	Policy 7	Mitigation measures will be required to ensure that new	To address comments made by

		development at the Airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. <u>Where possible</u> , ecological enhancements should be incorporated as an integral part of the development.	Albemarle (Rep 65/48) in their response to the 2016 Local Plan consultation, bringing the policy in line with the National Planning Policy Framework.
MM21	Policy 7	Infrastructure requirements are to be addressed through s106/ CIL / planning conditions as appropriate.	To retain flexibility, until Council considers CIL in more detail.
MM22	Policy 81100 new dwellings within the Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u>	For clarification
MM23	Policy 8	...within Adur District during the plan period to 2034 <u>2</u> .	To extend the plan period of the JAAP, in line with proposed modification to Policy 3.
MM24	Policy 8A total of a <u>Approximately</u> 16,000 sqm of employment generating uses.....	For clarification
MM25	Policy 8	...provided up to 2034 <u>2</u> .	To extend the plan period of the JAAP, in line with proposed modification to Policy 3.
MM26	Policy 8 Character Area 5	To designate Southwick Waterfront as a strategic employment area (Strategic Site 3).	Deleted as JAAP strategic sites not referred to elsewhere in this Local Plan.
MM27	Policy 8 Character Area 7	To designate the Western Harbour Arm (Waterfront) as a strategic mixed-use area (Strategic Site 4).	Deleted as JAAP strategic sites not referred to elsewhere in this Local Plan.
MM28	Para 3.1	...More detail regarding appropriate uses in Lancing town centre is set out in the policy below. These are viewed as positive planning actions to maintain and enhance a healthy and vibrant village centre. <u>The policy also allows for appropriate D1 uses in certain circumstances in the primary and secondary frontages of Lancing town centre in addition to A class uses. Please see</u>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<u>paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u>	
MM29	Policy 9	<p>Within the primary frontages of blocks 1, 2 (excluding Queensway Shopping Precinct) and 3, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A3 (food and drink), A4 (drinking establishments) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of Queensway Shopping Precinct, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), A5 (hot food takeaways) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. 	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.
MM30	Para 3.13 and new para 3.13a	Shoreham town centre is relatively healthy and provides a different and complementary retail offer distinct from the larger shopping centres in the area (Brighton and Worthing). Its day-to-day shopping function should be	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<p>protected, and its niche shopping role maintained and developed to serve the needs of residents and visitors, including the needs arising from new homes and businesses proposed in the area. <u>The policy below allows for A class uses as well appropriate D1 uses in certain circumstances in the primary and secondary frontages in Shoreham town centre. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></p> <p>3.13a However Opportunities are limited in the core of the existing town centre to accommodate significant additional retail floorspace because of physical constraints. As a result, any larger-scale convenience retail development should be located on the eastern side of the town centre to help reinforce the existing shopping centre and to meet the demand from growth at Shoreham Harbour.¹ The Adur Retail Study Update produced in 2013 identified capacity for an additional 3,250 sqm of convenience goods floorspace and 6,550 sqm of comparison goods floorspace in Shoreham town centre up to 2031. These capacity figures assume an altering of the balance of market shares with other shopping areas as a result of new retail development in Shoreham Town Centre.</p>	
MM31	Policy 11	<p>Within the primary frontages of blocks 2, 3, 5 and 6 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A3 (food and drink) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let 	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<p>the premises for A1 use.</p> <p>Any other uses will be resisted.</p> <p>Within the primary frontage of block 4, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) and A3 (food and drink). • <u>Appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 or A3 use.</u> <p>Any other uses will be resisted.</p> <p>Within the secondary frontages of blocks 1, 7 and 8, the following uses will be acceptable at ground floor level, subject to other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops), A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <u>and appropriate D1 (non-residential institutions) uses.</u> 	
MM32	Para 3.34	<p>Southwick Square is owned by Adur District Council and performs well as a shopping centre meeting local day-to-day needs. The Adur Retail Study Update (2013) recommends that every opportunity should be taken to sustain and enhance its important shopping function and to improve its existing environment and townscape quality. The centre also provides other services for the community including a library, health centre and a community centre. <u>The policy below allows for A class uses as well</u></p>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<u>appropriate D1 uses within Southwick Square. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u>	
MM33	Policy 12	Within the primary frontage of Southwick town centre, A1 (shop) uses will be supported. A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <u>and appropriate D1 (non-residential institutions)</u> uses will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.
MM34	4.27	... The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report <u>together with the Objectively Assessed Housing Need Update 2016 (which uses the rebased 2014 Sub-National Population and Household Projections)</u> builds on this work...	Update
MM35	4.29	The findings from the OAN reports suggest that <u>for market housing...</u>	Consistency with other major modifications.
MM36	4.29	... However, at a district wide level, <u>within the Local Plan area</u> future delivery of market housing should reflect the following mix:	Correction.
MM37	4.29	<input type="checkbox"/> 1-bed properties: <u>5-10%</u> <input type="checkbox"/> 2-bed properties: <u>40-45%</u> <input type="checkbox"/> 3-bed properties: <u>40-45%</u> 35% <input type="checkbox"/> 4-bed properties: <u>5-10%</u>	Updated to reflect the Objectively Assessed Housing Need Update (2016).
MM38	4.30	The OAN <u>2016</u> report indicates that the population of Adur is ageing with <u>a greater proportion of the population in age groups 65+</u> the 75+ age group showing the greatest proportional increase over the Plan period.	Updated to reflect most recent evidence.

MM39	4.40	<p>It indicated that there continues to be a high level of need for affordable housing in Adur and identified a requirement for 233 (net) homes per annum between 2011-2031 if all households in housing need were to be housed. <u>The Objectively Assessed Housing Need Update report (2016) has updated the need for different tenures and sizes of affordable homes, based on demographic change.</u></p>	Updated to reflect most recent evidence.
MM40	4.40A	<p>Average wages in Adur are low and an estimated 83% of households with a current need are unlikely to have sufficient income to afford market housing. <u>The scale of affordable housing need is substantial and whilst it is unrealistic that this need will be met in full, an upward adjustment of 10% to demographic projections has been taken account of within the objectively assessed need figure, in order to boost the delivery of both market and affordable housing and improve affordability.</u> The evidence indicates that, whilst there is a shortfall in the need for and supply of affordable housing, it does not necessitate an increase in the overall housing supply. However, a higher level of overall housing delivery would help improve affordability for younger households and so over the Plan period an increase of 10 homes per annum is considered appropriate</p>	Updated to reflect most recent evidence.
MM41	4.40C	<p>Smaller properties are in greatest demand, although letting requirements on 4+bed properties are more critical, as there is minimal turnover on these larger homes. At a district-wide level, the OAN report recommends the following mix of affordable housing:</p> <ul style="list-style-type: none"> ● 1 bed dwellings 20-25% ● 2 bed dwellings 30-35% ● 3 bed dwellings 30-35% ● 4 bed dwellings 10-15% 	Updated to reflect most recent evidence.

In terms of need for different sizes of dwellings, evidence clearly indicates that the need for social/rented dwellings is focused towards smaller dwellings but with an overall profile whereby the greatest need is for two and three bed dwellings:

	<u>1 bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>
<u>Intermediate homes</u>	<u>15-20%</u>	<u>50-55%</u>	<u>25-30%</u>	<u>0-5%</u>
<u>Social/Affordable Rent</u>	<u>30%</u>	<u>40%</u>	<u>25%</u>	<u>5%</u>

MM42

New paragraph at 4.66a

It is considered that due to the changing role of town centres as a result primarily of the growth in online shopping, there is a need for high streets to offer something that the internet cannot. Therefore, in addition to A3 and A4 uses, the place based policies in Part 3 of this Plan also allow for appropriate D1 uses in the primary and secondary frontages. In this case, appropriate D1 uses are those that contribute positively to the vitality and viability of a centre, generating footfall throughout the day and retaining a shopfront. Such uses would normally include those in the health and beauty sector.

To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

Appendix 3: Minor Modifications

MINOR MODIFICATIONS PROPOSED TO THE SUBMISSION ADUR LOCAL PLAN

The schedule below sets out changes proposed to the Submission Adur Local Plan 2016, submitted under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

These minor modifications are intended to assist the Inspector in understanding the Council's position.

Minor modifications are generally regarded as textual and grammar corrections, rephrasing or limited new text to add clarity, or updates to figures or references which are necessary due to alterations which have been made elsewhere or for which there is new information.

In all cases the reason for the change is stated.

Mod No:	Reference (Paragraph, policy or map number)	Amendment (deleted text shown as struck through and additional text shown in bold and underlined)	Reasons For Change (Please note that references to representations refer to those received in response to the Amendments to the Proposed Submission Adur Local Plan 2016 unless otherwise stated).
	Part One		
MIN 1	1.1	The Adur Local Plan 2014 is a new plan which will provide a strategy for development in Adur up to 2034 2 .	To ensure that the Plan has a 15 year life from adoption in 2017.
MIN2	1.3	The Local Plan, when adopted,	To reflect anticipated adoption
MIN3	1.7	“West Sussex County Council is responsible for preparing statutory land use plans for minerals and waste. Adopted sites have been identified and	Amendment made in response to Rep 63/23 from West Sussex County Council; amendment updates and

		safeguarded in the West Sussex Minerals and Waste Local Plans 2003. Proposals for development should have regard to the defined County Minerals Safeguarding Area and Minerals Consultation Area guidance and policy produced by West Sussex County Council. The Waste Local Plan safeguards allocated waste sites and permitted capacity for waste management. Preparation of site plans will require liaison with WSCC at an early stage to ensure that any potential minerals and waste interests are fully considered in planning development”.	makes paragraph consistent
MIN4	Paragraph 1.8	...A separate Background Evidence Document has been prepared to give more information on certain policies and issues	A Background Evidence Document has not been prepared for submission version of Plan.
MIN5	Paragraph 1.15	...development in Adur District op to 2034 <u>2</u>	To reflect main modifications which seek to extend Plan period.
MIN6	Paragraph 1.16	...Greater detail as to the background, policy context and evidence can be found in the accompanying Background Evidence Document.	A Background Evidence Document has not been prepared for submission version of Plan.
MIN7	Para 1.20, Footnote 8	This Plan covers the period up to 2034 <u>2</u>	To reflect main modifications which seek to extend Plan period.
MIN8	Para 1.25 Footnote 9	Delete footnote: 9 This Plan covers the period up to 2031.	Amendment made in response to Rep 63/23 from West Sussex County Council; footnote repeated in error
MIN9	Para 1.25 Issue 3 Footnote 13	See Objectively Assessed Need for Housing: Adur District (2015)(GL Hearn), <u>Objectively Assessed Housing Need Update 2016 (GL Hearn)</u> and....	Update
MIN10	Para 1.25 Issue 4 Footnote 14	See Objectively Assessed Need for Housing: Adur District (2015)(GL Hearn), <u>Objectively Assessed Housing Need Update 2016 (GL Hearn).</u>	Update
MIN11	Paragraph 1.25	...issues that will affect Adur up to 2034 <u>2</u> and beyond.	To reflect main modifications which seek to extend Plan period.
MIN12	Paragraph 1.25 Key Issue 8	...Subject to planning approval, C construction of the scheme will commence <u>early</u> 2016 and is likely to be	Update – the scheme was granted consent in June 2016, and

		completed in 2018.	construction will commence soon.
MIN13	Paragraph 1.33	The vision sets out how Adur will have changed by 2034 2 .	To reflect main modifications which seek to extend Plan period.
MIN14	Paragraph 1.34 Vision 2	Most development will have been focussed around Adur's main communities - Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate - and measures will have been taken to reduce their its impact on the environment.	Correction of drafting error.
MIN15	Paragraph 1.34 Vision 4	Much of the regeneration of Shoreham Harbour will have been delivered, achieving a mix of residential, employment, community, leisure and retail and development, and affordable housing.	Correction of drafting error.
MIN16	Objective 1	<i>...a minimum of 3609 dwellings up to 20342....</i>	To reflect main modifications which seek to extend Plan period.
Part Two			
	Paragraph 2.5	...(excluding Sompting Village which lies outside the Built Up Area Boundary (BUAB))	For clarification
MIN17	Para 2.19	...the Shoreham Harbour Regeneration area, a large brownfield site, has been identified as a broad location for development, and this will deliver a minimum of 1100 additional new homes in the Western Harbour Arm (see Policy 8)	For clarification
MIN18	Table 1 below para 2.22	Shoreham Harbour Broad Location (Western Harbour Arm)	For clarification.
MIN19	Table 1 below para 2.22	Add new footnote: <u>The figure for Shoreham Harbour Broad Location does not include the 132 dwellings which have been granted planning permission and are counted as "Commitments"</u>	Amendment made in response to Rep 71/32 from Home Builders Federation
MIN20	Para 2.30	The recent economic downturn has not had a significant impact on Adur's economy. Although the number of jobs declined by approximately 400 during the recession, the district has since recovered and job numbers are back to pre-recession rates	Paragraph is out of date.

		(approximately 22,000 jobs).	
MIN21	2.53	... Any application <u>The flood risk assessment submitted at the planning application stage</u> will have to demonstrate <u>in greater detail</u> that current <u>how</u> flood risk from all sources is <u>will be</u> mitigated, <u>and</u> that flood risk to other areas is <u>will not be</u> increased, <u>and</u> that <u>Additionally</u> , where possible, <u>the flood risk assessment should identify opportunities to reduce</u> flood risk overall, <u>is reduced</u> .	For clarification.
MIN22	Para 2.54A	Wastewater from the new development will be expected to drain to a public sewer. If this is not feasible (following discussions with Southern Water Services and the Environment Agency) and there is evidence that there is no alternative available to provide <u>a-all options for</u> connection to the public sewerage network <u>have been fully explored</u> , the advice in paragraph 020 of the National Planning Practice Guidance should be followed. The operation of and future management of any <u>alternative</u> sewerage treatment plant <u>scheme</u> should be set out clearly in any planning application for the development of the site.	Amendment suggested by the Environment Agency (Representation 53/6) to ensure that all mains sewerage connection possibilities are fully considered in the first instance.
MIN23	Paragraph 2.53 Footnote 15	See the Sequential and Exceptions Test 2014 <u>2016</u>	Update
MIN24	Para 2.86	Approximately <u>A minimum of</u> 1,100 new dwellings <u>in the Western Harbour Arm</u> and <u>approximately</u> 16,000 sqm of employment generating uses.....	Amendment made for consistency with Shoreham Harbour Joint Area Action Plan..
MIN25	Para 2.86	...within the Plan period to 2034 <u>2</u> .	To reflect main modifications which seek to extend Plan period.
MIN26	Para 2.100	...A similar policy is likely to be included within the emerging updated West Sussex Minerals Local Plan <u>being prepared in partnership with the South Downs National Park</u> .	Amendment made to ensure factually correct.
MIN27	Para 2.101	Shoreham Harbour Transport Strategy (2014)	In order that future updates of this document are taken into account.
Part Three			

MIN28	Para 3.13 footnote	Adur District Council Retail Study Update 2009 2013	To correct a drafting error
MIN29	Para 3.36	...which identifies land at Eastbrook a Allotments	To correct a drafting error
MIN30	Para 3.40	Land which lies outside of the defined Built Up Areas-is considered to be countryside...	To correct a drafting error
MIN31	Para 3.56A	The Marine Management Organisation (MMO) was created in order to achieve clean, healthy safe and productive and biologically diverse seas. The MMO is currently preparing a Marine Plan for the south area, which includes Adur. <u>When in place, decisions that might or will affect the marine area will need to take appropriate consideration of the relevant marine planning documents, including the South Marine Plans under the terms set out in the Marine and Coastal Access Act, 2009 (section 58).</u> The Marine Policy Statement is the relevant marine planning document until the Marine Plan is published.	Clarification made in response to Representation 56/41 from the Marine Management Organisation, in order to demonstrate role of marine plans in decision making.
Part Four			
MIN32	Para 4.7	...The Commission for Architecture and the Built Environment (CABE) have published 'Buildings for Life' standards by which for residential-development applications will be assessed. The , the-use of these which standards will be encouraged.	Clarification that Buildings for Life standards are encouraged, but not required.
MIN33	4.23 Section Heading	Decentralised Energy and , Standalone Energy Schemes and Renewable Energy	Title of section has been changed so that it is consistent with the title of the policy.
MIN34	Para 4.28	The OAN reports <u>s</u>	To reflect proposed major modifications
MIN35	Policy 26	(ii) It can be satisfactorily demonstrated that the site or premises is/are genuinely redundant and that no effective demand exists or is likely to exist in the future to use the land or buildings of for B class uses. This should include the length of time the property has remained vacant, the attempts made to sell/let it, and the demand for the size and type of employment	To correct a drafting error

		premises in the area.	
MIN36	Para 4.129	<p>Where sites have passed the sequential test, they have been assessed against the objectives of the Sustainability Appraisal to determine whether the sustainability benefits to the community outweigh flood risk as part of the Exceptions Test. The sites that demonstrate these wider benefits and have also shown, <u>under Part 2 of the Exception Test,</u> that flood risk on the site can be <u>potentially be</u> managed without increasing flood risk elsewhere have been allocated in this plan. Further detail regarding the management of flood risk would be required at the planning application stage where the developer would be required to produce a <u>detailed</u> site specific Flood Risk Assessment. The second part of the exceptions test requires that a site specific flood risk assessment must be undertaken to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This part of the exceptions test would be undertaken at the planning application stage.</p>	To improve text and correct drafting errors.
MIN37	4.130	<p>...The Environment Agency, as part of the Rivers Arun to Adur Flood and Erosion Management Strategy 2010-2020, are progressing a flood defence scheme along both the east and west bank of the River Adur, which will help to considerably reduce the risk of tidal flooding in the district. An indicative completion date for this scheme is 2017 2018.</p>	Correction
MIN38	Appendix 4	Delete entire Appendix.	Matters to be addressed/ explored via Joint Area Action Plan.

Submission Adur Local Plan
Proposed Major Modifications
Sustainability Appraisal Addendum

September 2016

1. Introduction

- 1.1 Adur District Council began the preparation of the Adur Local Plan in 2011. As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken (hereinafter referred to as SA).
- 1.2 A SA Report has been produced at various stages throughout the development of the Local Plan, including the SA of the Adur Local Plan in March 2016, documenting the SA process and assessment of results up to that point.
- 1.3 Following consultation on the 'Amendments to Proposed Submission Adur Local Plan' (2016), a small number of major modifications are proposed for the following reasons:
 - To address some matters raised in representations made during the statutory publication period for the Amendments to the Proposed Submission Adur Local Plan 2016; and
 - To improve the Plan.
- 1.4 Given that these constitute major modifications i.e. changes which alter a policy or part of the strategy, it is considered that they should be considered against relevant Sustainability Objectives to see if they would have any impact on the findings of the Sustainability Appraisal. The purpose of this addendum report therefore is to assess the sustainability implications of these proposed modifications.
- 1.5 The table below sets out the policy changes, the reasons for them and the effect they have on the SA.

Mod No.	Reference (Paragraph, policy or map number)	Amendment (deleted text shown as struck through and additional text <u>shown in bold and underlined</u>)	Reasons For Change (Please note that references to representations refer to those received in response to the Amendments to the Proposed submission Adur Local Plan 2016 unless otherwise stated).	SA comments
MM1	Paragraph 1.34 Vision 7	Adur's character and local distinctiveness (urban and rural, coastal and countryside) will have been maintained and enhanced through protection and enhancement of its landscape, townscape, cultural heritage and biodiversity. Important views will have been protected. <u>Net gains in natural capital will have been delivered.</u>	To address issues raised by Sussex Wildlife Trust (rep 70/25) and to clarify the need for the Plan to deliver net gains in natural capital.	While this addition emphasises the need for net gains in natural capital, it does not require a change to the objectives or policies within the Plan and therefore has no effect in terms of the SA findings.
MM2	Policy 2	Up to 2031 <u>2032</u>	To ensure Plan has 15 year time-span post anticipated	While this amendment affects the time-span of the Plan

			adoption in 2017.	by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM3	Heading	HOUSING PROVISION 2011- 20342	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	This is an amendment to a sub-heading and will not, in itself, have any effect on the outcome of the SA.
MM4	2.13	The most up-to-date work on OAN, and that which is used in this Local Plan, is the Objectively Assessed Need for Housing: Adur District 2015 study <u>Objectively Assessed Housing Need Update 2016</u> ³	Update	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM5	Footnote	3 Objectively Assessed Need for Housing: Adur District 2015. <u>Objectively Assessed Housing Need Update 2016</u> ³ (GL Hearn).	Update	This is an update to a footnote referred to in the supporting text and not a policy.

				Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM6	2.14	This 2015 2016 study uses an updated set of demographic projections, taking account of information including 2012 2014 -based Sub-National Population Projections (March 2014 May 2016) and the 2012 4 based Household Projections (February 2015 July 2016). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM7	2.16	In terms of Adur's Objectively Assessed Needs the study recommends the delivery of 294 325 dwellings per annum 6,825 5820 dwellings over the Plan period). This represents 'demand' for new housing.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM8	2.16A	The OAN 2016 assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for 29 38 bedspaces over the plan period 2011-2034 2 which equates to 1-2 per annum.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of

				the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM9	2.20	This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4,296 3,294 dwellings. It has therefore been necessary to allocate greenfield sites.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM10	2.22	... Taking these greenfield sites into account the Plan can deliver 3609 dwellings (172 480 dpa), leaving a shortfall of 2244 3,216 dwellings.		This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM11	Table 1	Table 1 – Housing supply over the Local Plan Period 2011-2034-2	To ensure Plan has 15 year time-span post anticipated	This is an amendment to supporting text and will not, in

		<p>Sources of Housing Supply</p> <p>Dwellings completed (net)2011-- 2015 528</p> <p>Existing commitments (large and small sites where planning permission has been granted) 326</p> <p>Sites identified in the SHLAA (net) 2015 291</p> <p>Windfall allowance 416</p> <p>Sites to be identified in Local Plan:</p> <p>Shoreham Harbour Broad Location 968</p> <p>New Monks Farm Strategic Allocation 600</p> <p>West Sompting Strategic Allocation 480</p> <p>Total Housing Supply (Delivery Target) 2011-2031<u>2</u> 3609</p> <p style="text-align: right;">(annual target 180-172)</p>	adoption in 2017.	itself, have any effect on the outcome of the Sustainability Appraisal.
MM12	2.23	Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of 5820 6825 dwellings	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM13	Policy 3	<p>Policy 3: Housing Provision</p> <p>Over the period 2011 – 2031<u>2</u> a minimum of 3609 dwellings will be developed in Adur, as follows:</p> <ul style="list-style-type: none"> • 1429 within the built up area of Adur • 1100 as part of the Shoreham Harbour Regeneration 	To ensure Plan has a 15 year time-span post anticipated adoption in 2017.	Whilst this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to

		<p style="text-align: center;">Area Western Arm</p> <ul style="list-style-type: none"> • 600 at New Monks Farm • 480 at West Sompting 		be provided over the plan period and would therefore have negligible effects on the SA findings.
MM14	2.24	The figures in Policy 3 above equate to an annual target of 480 172 dwellings per year over the 20 1 year plan period.	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM15	Policy 4	To facilitate regeneration and ensure a sustainable economy, land will be allocated to provide a total of approximately 41,000 square metres of land will be allocated of floorspace for appropriate employment generating uses in Adur up to 2031 at the following locations:	To correct a drafting error	This amendment will have little impact on the outcome of the Sustainability Appraisal (SA) as the SA of policy 4 was undertaken on the basis that 41,000sqm of employment generating floorspace would be delivered through the allocations

				specified in the policy rather than an allocation of 41,000sqm of land.
MM16	Policy 4	up to 2034 2 at the following locations:	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	While this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM17	Policy 5	The Withy Patch Gypsy and Travellers site should be relocated, <u>to allow for the delivery of the new roundabout access onto the A27,</u> and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.	To address a point made by Albermarle (Rep 65/48) in their response to the 2016 Local Plan consultation, to make clear that the travellers site would be relocated specifically to allow delivery of the proposed new roundabout access.	This amendment aims to provide clarity rather than change the intention of the policy in any way. Therefore it would have no impact on the outcome of the SA.

MM18	Policy 6 Second bullet point	<ul style="list-style-type: none"> • ...A27 Sompting Bypass/ Upper Brighton Road (Lyons Farm junction), <u>A27/Dankton Lane junction</u>, and enhancement of the traffic calming scheme in West Street. 	Amendment made in response to comments made by Turleys (rep 62/66) and Highways England (rep 69/42)	This amendment to include improvements to the A27/Dankton Lane junction would have no significant effect on the outcome of the Sustainability Appraisal.
MM19	Policy 6	<p>....Appropriate mitigation of any issues raised through these assessments is to be secured.</p> <p>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate</p> <p>....and upsizing purposes.</p> <p>All elements are to be secured through s106/planning conditions. <u>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</u></p>	Correction of drafting error. There were two references to the collection of contributions in the policy. This has been simplified to one reference at the very end of the policy.	This amendment is a correction of a drafting error and has no significant effects on the aim of the policy or the Sustainability Appraisal.
MM20	Policy 7	Mitigation measures will be required to ensure that new development at the Airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. <u>Where possible,</u> ecological enhancements should be incorporated as an integral part of the development.	To address comments made by Albemarle in their response to the 2016 Local Plan consultation, bringing the policy in line with the National Planning	While this addition provides slightly more flexibility around the provision of ecological enhancements, it would not have a significant effect

			Policy Framework.	on the outcome of the Sustainability Appraisal.
MM21	Policy 7	Infrastructure requirements are to be addressed through s106/ <u>CIL</u> planning conditions as appropriate.	To address comments made by Albemarle in their response to the 2016 Local Plan consultation, bringing the policy in line with the National Planning Policy Framework.	While this is an addition to policy, the amendment doesn't have a significant impact on the aim of the policy and would therefore have no effect on the outcome of the SA.
MM22	Policy 81100 new dwellings within the Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u>	For clarification	This amendment is a clarification and has no effect on the aim of the policy or the outcome of the Sustainability Appraisal.
MM23	Policy 8	...within Adur District during the plan period to 2034 <u>2</u> .	To extend the plan period of the JAAP, in line with proposed modification to Policy 3.	While this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have

				negligible effects on the SA findings.
MM24	Policy 8	A total of a A Approximately 16,000 sqm of employment generating uses.....	For clarification.	This amendment is a clarification and has no effect on the aim of the policy or the outcome of the Sustainability Appraisal.
MM25	Policy 8	...provided up to 2034 2 .	To extend the plan period of the Shoreham Harbour JAAP, in line with proposed modification to Policy 3.	While this amendment affects the time-span of the Plan by one year, it does not affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM26	Policy 8 Character Area 5	To designate Southwick Waterfront as a strategic employment area (Strategic Site 3).	Deleted as Shoreham Harbour JAAP strategic sites not referred to elsewhere in this Local Plan.	This amendment would have no impact on the aim of the policy and therefore no effect on the outcome of the Sustainability Appraisal.

MM27	Policy 8 Character Area 7	To designate the Western Harbour Arm (Waterfront) as a strategic mixed-use area (Strategic Site 4).	Deleted as JAAP strategic sites not referred to elsewhere in this Local Plan.	This amendment would have no impact on the aim of the policy and therefore no effect on the outcome of the Sustainability Appraisal.
MM28	Para 3.1	...More detail regarding appropriate uses in Lancing town centre is set out in the policy below. These are viewed as positive planning actions to maintain and enhance a healthy and vibrant village centre. <u>The policy also allows for appropriate D1 uses in certain circumstances in the primary and secondary frontages of Lancing town centre in addition to A class uses. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 9. While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM29	Page 68, Policy 9	Within the primary frontages of blocks 1, 2 (excluding Queensway Shopping Precinct) and 3, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies: <ul style="list-style-type: none"> • A1 (shops) • A3 (food and drink), A4 (drinking establishments) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) 	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below). While the

		<p>and reasonable attempts have been made to sell or let the premises for A1 use.</p> <p>Any other uses will be resisted.</p> <p>Within the primary frontage of Queensway Shopping Precinct, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), A5 (hot food takeaways) and appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. 		<p>addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.</p>
MM30	Para 3.13 and new para 3.13a	<p>Shoreham town centre is relatively healthy and provides a different and complementary retail offer distinct from the larger shopping centres in the area (Brighton and Worthing). Its day-to-day shopping function should be protected, and its niche shopping role maintained and developed to serve the needs of residents and visitors, including the needs arising from new homes and businesses proposed in the area. <u>The policy below allows for A class uses as well appropriate D1 uses in certain circumstances in the primary and secondary frontages in Shoreham town centre. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></p> <p><u>3.13a</u> However Opportunities are limited in the core of the existing town centre to accommodate significant additional retail floorspace because of physical constraints. As a result, any larger-scale convenience retail development should be located on the eastern side of the town centre to help reinforce the existing shopping centre and to meet the demand from growth at Shoreham Harbour.² The Adur Retail Study Update</p>		<p>This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 11. While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the</p>

² Adur District Council Retail Study Update 2009

		<p>produced in 2013 identified capacity for an additional 3,250 sqm of convenience goods floorspace and 6,550 sqm of comparison goods floorspace in Shoreham town centre up to 2031. These capacity figures assume an altering of the balance of market shares with other shopping areas as a result of new retail development in Shoreham Town Centre.</p>		Sustainability Appraisal.
MM31	Policy 11	<p>Within the primary frontages of blocks 2, 3, 5 and 6 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A3 (food and drink) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of block 4, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) and A3 (food and drink). • <u>Appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 or A3 use.</u> <p>Any other uses will be resisted.</p> <p>Within the secondary frontages of blocks 1, 7 and 8, the following uses will be acceptable at ground floor level, subject to other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops), A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <u>and appropriate D1 (non-residential</u> 	<p>To provide more flexibility and recognise the role that some D1 uses can make to the town centre.</p>	<p>This addition needs to be read in conjunction with new paragraph 4.66a (see below). While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.</p>

		<u>institutions) uses.</u>		
MM32	Para 3.34	Southwick Square is owned by Adur District Council and performs well as a shopping centre meeting local day-to-day needs. The Adur Retail Study Update (2013) recommends that every opportunity should be taken to sustain and enhance its important shopping function and to improve its existing environment and townscape quality. The centre also provides other services for the community including a library, health centre and a community centre. <u>The policy below allows for A class uses as well appropriate D1 uses within Southwick Square. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 12. While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM33	Policy 12	Within the primary frontage of Southwick town centre, A1 (shop) uses will be supported. A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 <u>and appropriate D1 (non-residential institutions)</u> uses will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below). While the addition supports a number of the Sustainability Objectives, it would have little effect on the

				outcome of the Sustainability Appraisal.
MM34	4.27	... The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report <u>The Objectively Assessed Housing Need Update 2016 (which uses the rebased 2014 Sub-National Population and Household Projections)</u> builds on this work...	Update	This is an update to supporting text and not policy. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM35	4.29	The findings from the OAN reports suggest that <u>for market housing...</u>	Consistency with other major modifications.	This is an update to supporting text and not policy. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM36 MM37	4.29	... However, at a district wide level, <u>within the Local Plan area</u> future delivery of market housing should reflect the following mix: <input type="checkbox"/> 1-bed properties: 5-10% <input type="checkbox"/> 2-bed properties: 40-45% <input type="checkbox"/> 3-bed properties: <u>40-45%</u> 35% <input type="checkbox"/> 4-bed properties: 5-10%	Correction. Updates to reflect the Objectively Assessed Housing Need Update (2016).	This is an update to supporting text and not policy. Additionally, the update reflects current housing need. This would have no effect on the outcome of the Sustainability Appraisal.
MM38	4.30	The OAN <u>2016</u> report indicates that the population of Adur is ageing with <u>a greater proportion of the population in age groups 65+</u> the 75+ age group showing the greatest proportional increase over the Plan	Updated to reflect most recent evidence.	This is an update to supporting text and not policy

		period.		and would have no effect on the outcome of the Sustainability Appraisal.
MM39	4.40	It indicated that there continues to be a high level of need for affordable housing in Adur and identified a requirement for 233 (net) homes per annum between 2011-2031 if all households in housing need were to be housed. <u>The Objectively Assessed Housing Need Update report (2016) has updated the need for different tenures and sizes of affordable homes, based on demographic change.</u>	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.
MM40	4.40A	Average wages in Adur are low and an estimated 83% of households with a current need are unlikely to have sufficient income to afford market housing. <u>The scale of affordable housing need is substantial and whilst it is unrealistic that this need will be met in full, an upward adjustment of 10% to demographic projections has been taken account of within the objectively assessed need figure would boost the delivery of both market and affordable housing and improve affordability.</u> The evidence indicates that, whilst there is a shortfall in the need for and supply of affordable housing, it does not necessitate an increase in the overall housing supply. However, a higher level of overall housing delivery would help improve affordability for younger households and so over the Plan period an increase of 10 homes per annum is considered appropriate	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.
MM41	4.40C	Smaller properties are in greatest demand, although letting requirements on 4+bed properties are more critical, as there is minimal turnover on these larger homes. At a district-wide level, the OAN report	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would

		<p>recommends the following mix of affordable housing:</p> <ul style="list-style-type: none"> • 1 bed dwellings 20-25% • 2 bed dwellings 30-35% • 3 bed dwellings 30-35% • 4 bed dwellings 10-15% <p><u>In terms of need for different sizes of dwellings, evidence clearly indicates that the need for social/ rented dwellings is focused towards smaller dwellings but with an overall profile whereby the greatest need is for two and three bed dwellings:</u></p> <table border="1" data-bbox="571 778 1503 986"> <thead> <tr> <th></th> <th><u>1 bedroom</u></th> <th><u>2 bedrooms</u></th> <th><u>3 bedrooms</u></th> <th><u>4+ bedrooms</u></th> </tr> </thead> <tbody> <tr> <td><u>Intermediate homes</u></td> <td><u>15-20%</u></td> <td><u>50-55%</u></td> <td><u>25-30%</u></td> <td><u>0-5%</u></td> </tr> <tr> <td><u>Social/Affordable Rent</u></td> <td><u>30%</u></td> <td><u>40%</u></td> <td><u>25%</u></td> <td><u>5%</u></td> </tr> </tbody> </table>		<u>1 bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>	<u>Intermediate homes</u>	<u>15-20%</u>	<u>50-55%</u>	<u>25-30%</u>	<u>0-5%</u>	<u>Social/Affordable Rent</u>	<u>30%</u>	<u>40%</u>	<u>25%</u>	<u>5%</u>		<p>therefore have no effect on the outcome of the Sustainability Appraisal.</p>
	<u>1 bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>															
<u>Intermediate homes</u>	<u>15-20%</u>	<u>50-55%</u>	<u>25-30%</u>	<u>0-5%</u>															
<u>Social/Affordable Rent</u>	<u>30%</u>	<u>40%</u>	<u>25%</u>	<u>5%</u>															
MM42	New paragraph at 4.66a	<p><u>It is considered that due to the changing role of town centres as a result primarily of the growth in online shopping, there is a need for high streets to offer something that the internet cannot. Therefore, in addition to A3 and A4 uses, the place based policies in Part 3 of this Plan also allow for appropriate D1 uses in the primary and secondary frontages. In this case, appropriate D1 uses are those that contribute positively to the vitality and viability of a centre, generating footfall throughout the day and retaining a shopfront. Such uses would normally include those in the health and beauty sector.</u></p>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with the proposed additions to policies 9, 11 and 12 (see above). While the addition supports a number of the Sustainability															

				Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
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2. Conclusion

- 2.1 As can be seen from the table above, none of the proposed modification would have any significant effect on the outcome of the Sustainability Appraisal, even where changes have been made to policies. This is because none of the changes affect the aims or intentions of the policies or Plan in any significant way.

<file reference>
(to be completed by Democratic Services)